

SHER TREMONTE LLP

June 12, 2016

BY ECF

The Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007-1312

Re: *United States v. Jason Galanis et al.*, 16-CR-371 (RA)

Dear Judge Abrams:

We write on behalf of our client, Gary Hirst, to request that the Court extend the current deadline for execution of Mr. Hirst's personal recognizance bond by the third of three required co-signatories. The government consents to the proposed extension.

The personal recognizance bond securing Mr. Hirst's pre-trial release in the above-captioned matter (the "Bond") is required to be executed by three co-signers on or before June 14, 2016. The government has approved three proposed co-signatories, two of whom executed the bond on June 10. The third co-signatory, Robert Hirst, is currently in the middle of an extended business trip, as a result of which he will be unable to execute the Bond before the last week of June. Accordingly, we respectfully request that Your Honor extend the time by which the Bond must be fully executed until June 30, 2016.

The government consents to the requested extension. This is the first request for a modification of the terms of Mr. Hirst's pre-trial release.

Respectfully submitted,

/s/

Michael Tremonte

cc: All counsel (via ECF)